

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re: WANSDOWN PROPERTIES CORPORATION, N.V., Debtor.	Chapter 11  Case No. 19-13223-smb
WANSDOWN PROPERTIES CORPORATION, N.V., Plaintiff, - against - AZADEH NASSER AZARI, Defendant.	Adv. Pro. No. 19-1450-smb

**STIPULATION AND AGREED ORDER ESTABLISHING DISCOVERY SCHEDULE  
FOR ADVERSARY PROCEEDING WANSDOWN V. AZARI, ADV. PRO. NO. 19-1450**

WHEREAS, on December 18, 2019, Wansdown Properties Corporation N.V. (the “Debtor”) filed the above-captioned adversary proceeding (the “Action”) against defendant Azadeh Nasser Azari (“Ms. Azari”)

WHEREAS, on May 20, 2020, Debtor filed its second amended complaint in the Action;

WHEREAS, on June 11, 2020, defendant Ms. Azari filed her Answer and Affirmative Defenses;

WHEREAS, on July 2, 2020, counsel for defendant Ms. Azari sent a “meet and confer” email to counsel for Debtor concerning four topics, including (i) the discovery schedule going forward; (ii) the parties’ electronically stored information (“ESI”); (iii) Debtor’s paper documents located in a storage facility; and (iv) Debtor’s other proceedings in bankruptcy (“July 2nd Meet And Confer Email”);

WHEREAS, on July 15, 2020, counsel for Ms. Azari sent counsel for Debtor a Notice To Preserve ESI and Other Materials for the Action (“July 15th Letter”);

WHEREAS, on August 11, 2020, counsel for Debtor and Ms. Azari discussed the content and dates of the July 2nd Meet and Confer and July 15th Letter;

NOW THEREFORE, the Debtor and Ms. Azari (collectively, the “Parties”) hereby stipulate and agree, and it is hereby

ORDERED, that the Parties shall conduct and complete all discovery no later than March 1, 2021, with the parties complying with the following deadlines;

ORDERED, that the Parties shall submit their initial disclosures, document requests, and interrogatories by September 4, 2020;

ORDERED, that the Parties shall submit their responses to the opposing party’s discovery requests by October 5, 2020;

ORDERED, that the Parties shall produce all responsive documents to document requests by October 26, 2020;

ORDERED, that the parties shall complete all party depositions by December 4, 2020;

ORDERED, that the parties shall complete all third-party discovery by January 22, 2021;

ORDERED, that the parties shall complete expert discovery by February 19, 2021; and it is further

ORDERED, that the Court may order an extension of the deadlines for good cause.

Dated: New York, New York  
August 20, 2020

BLANK ROME LLP  
*Counsel to Debtor*

By: /s/ Martin Krezakek  
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By: /s/ Nader Mobargha  
Nader Mobargha  
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Dated: New York, New York  
August 21<sup>st</sup>, 2020

/s/ STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE